

# GIBSON DUNN

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September 4, 2018

## VIA ECF AND FAX

The Honorable Paul G. Gardephe  
United States District Judge for the Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, New York 10007-1312

Re: United States v. Kaleil Isaza Tuzman, S8 15 Cr. 536 (PGG)

Dear Judge Gardephe:

We respectfully submit this letter on behalf of Kaleil Isaza Tuzman. First, he would like to convey his deep gratitude to the Court for allowing him to spend time with his daughter in Louisiana two weeks ago. Second, he would like to respectfully request leave to be with his family and attend religious services for some of the upcoming Jewish High Holidays.

Specifically, Mr. Isaza Tuzman respectfully requests the Court's permission to travel to Pennsylvania from September 10–14 for Rosh HaShanah and to Massachusetts from September 26–30 for Sukkot. (Mr. Isaza Tuzman is not requesting leave for Yom Kippur or Simchat Torah—which he will observe with his congregation in New York—so as to not inundate the Court with leave requests.) Mr. Isaza Tuzman anticipates staying with his uncle Martin Tuzman and with his sister Intiya Isaza-Figueroa in Philadelphia and Boston, respectively, and will keep Pretrial Services apprised of his location.

If this leave request is granted, all other terms and conditions of home detention would remain in place, and Mr. Isaza Tuzman would remain at all times under the supervision of Pretrial Services.

This request has been communicated to Pretrial Services, which responded as follows: "As per our office policy, our office objects to out-of-district multi-day travel requests. This objection is general and not specific to Mr. Tuzman, who has remained compliant with supervision and has traveled without incident many times in the past. Please let me know if this is approved, and I will enter the schedule once I receive an itinerary."

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The government objects to this request.

Mr. Isaza Tuzman has previously traveled to Pennsylvania and Massachusetts for religious holiday observance with the Court's permission. *See* ECF Nos. 125, 441, 758. In these instances and every other time Mr. Isaza Tuzman has travelled outside this District as permitted by the Court, he has left and returned without incident.

We thank the Court for its consideration.

Respectfully submitted,

/s/ Avi Weitzman

Avi Weitzman

cc. All Counsel of Record (via ECF)  
Officer John Moscato, U.S. Pretrial Services (via E-mail)